

IN The United States District Court
for The Western District of Pennsylvania -
At 7/8/2005

Preston Catchings

VS

Mr. Morrow et. al.,

Civil Action NO. 03-284 ERIC

MOTION FOR SANCTIONS

Now comes Plaintiff Preston Catchings, inst. NO. BJ8956, seeking Court ORDERED SANCTION, pursuant to FEDERAL Rules of Civil Procedure, Rule 37(A)(2)(B), (3), (4), 37(B)(2)(D) AND (E), 37(C)(1), AND 37(A)(4), AND 37(B)(1) AND 42 PA. C.S.A. R. 4019 SANCTIONS.

Plaintiff AVERs that he HAS MOVED in numerous "good faith efforts" to Acquire discovery, testing procedure's, medical AND psychiatric document witnesses list AND other tangible things requested, in petition/request for inspection AND copying of documents, Motion to Compel, AND at the HEARING, ON Motion to Compel, which includes colloquy concerning Motion for Default Judgment, Therefrom DERIVED, A Court ORDER. MOVENT AVERs that all herein stated SANCTIONS will tend to exposing All fraudulent document, DECLARATIONS AND policies, The discovery will BRING to fact finder's ATTENTION the many mis-representations of medical documents, AND false (1) psychiatric reports imposed upon this Court AND plaintiff, while strategically implementing Deliberate acts AND facts, in procession to CONSUMMATE Preston Catchings DEATH. Plaintiff AVERs that he's NOT RECEIVED ANY Requested discovery.

SANCTIONS REQUESTED

Plaintiff OR Aggrieved Preston Catchings inst. NO. BJ8956, RE-

(1) psychiatric reports..

(2) of

quests that all sanctions be searched within this Motion for Sanctions. The Motion to Compel, requested in the Default Judgment Motion, be granted plaintiff and ordered effective immediately. The immediate Sanction are necessary to the sustenance of life, ① Transfer to (S.C.I.) State Correctional Institution Laurel Highland, (D.O.C.) Department of Corrections Medical facility, under The Americans with Disabilities Act of 1990, 42 U.S.C. § 12101, et. seq. and 42 U.S.C. § 12132, moreover, under the Rehabilitation Act 29 U.S.C. § 706(2)(B), and The (D.O.C.) Department of Corrections, Accommodations for inmates with disabilities (DC-ADM 006) and VIII. Medical Services (DC-ADM 820) because a Liver Disease of this magnitude requires specific types of medical care, unavailable at any other Institution in Pennsylvania, or transfer to a federal facility adequate to treatment for various diseases, included but not limited to, "Arteriosclerosis and Cancer," "Creative in antigen therapy," in accord with this therapy is the requisite remedial monetary sum (50,000) fifty thousand dollars, essential for the rehabilitation of phagocytosis, barriers, antibody mediated immune responses, lymphocytes, T-cells and B-cells, moreover, rehabilitation of burned cancerous tissue, within the metabolism system, including the stomach, pancreas, bladder, kidney's and the liver, necessary to employ the services of a nutrition specialist to assist in the creation of a antibody biochemical synthetic serum, and to advise and/or devise with plaintiff other types of assistance vital to the process of rehabilitation, subsuming any special surgical maneuvers to remove cancerous tissue, (In the form of direct monetary payment of (50,000) Dollars in a account under the name Preston Catchings;

The Department of Corrections pay the costs of med-

① AND BEARS ON THE DAMAGES TO THE LIVER AND OTHER ORGANS DURING THESE DILATORY FEATS; REFLECTS THE DISEASE INFLICTED, THE INJURIES IMPOSED AND THE FACTS OF THE CONTINUATION OF ASSAULTS TAKING PLACE AT PRESENT,

cal testing requested in the petition Production of Documents (65,000) sixty five thousand dollars to be put in a special account, payable to the chosen medical personnel, the terms of which shall be dictated by plaintiff, Preston Catchings #BJ8956, without deference to its access, or delays in its transference to the Doctor's Accounts. . . . The Aggrieved Preston Catchings #BJ8956, to be transferred temporarily to a outside hospital in Cambria County for purposes of independent medical testing in accord with Federal Rules Civil Procedure, Rule 26B and Rule 34 and Rule 35 Physical Examinations and reports thereof. (3)

The full return, an access to medically necessary therapeutic treatment plan "4000 calories per day, high vitamins bland diet, to include suppliments. (2) two ENSURE DRINKS per day. (1) one vitamin pill each day and 500 calories ~~at~~ night ~~per~~ day. (see motion to Compel for specific details of this therapeutic treatment plan).

The defendants BEAR all past, present and future Appellant AN COURT (Appellate) costs, such as I.F.P. payments, initial Complaint fees, any extra judicial function and/or exploitations, including but not limited to the Clerks help, any copying services needed, necessary for access to the Courts, due to Appellants indigent status and defendants impediments AN efforts to delay the establishment of plaintiffs claims. The costs of any witnesses who may be used at trial, including Court appointed officials versed in the medical AN psychiatric field AND any specialist (witnesses) service's rendered in movents quest to ENSCONCE his claims AND/OR present evidence in favor of refutation; The deciphering of Legal Jargon, AND mental health AN medical evaluations.

Permenent Restraining Order or Injunction directed towards Lt./mr. Morrow, AND Dr. Burke, the primary culprits of SCL, ALBION STAFF, from any ADDITIONAL coercion

③ UNDER The HABEAS Corpus AD-testificandum 28 U.S.C. § 2241 ACT.

of DOC employees in their vicious, venomous desire to purposely inflict pain and suffering upon Preston Catchings, and other inmates under penal servitude, in professional medical transgression, to commit Murder, to prevent any other DOC personnel from the acts or involvement of putting "Drugs and mind altering chemicals, or any types, textures or strains of acids in Preston Catchings, food's, on or in his clothing, shoes, sheets, blanket's towels or any other property possessed by plaintiff and/or any type of medication to be given the above named aggrieved. Injunction against all psychological torture, the schemes to implement retaliation, harassment and/or any improper or unethical medical treatment in the future..

Moreover, Injunctive relief Expungement of this tyrannical physically abusive (13) thirteen years of restricted housing unit (hole time) forced upon aggrieved, to keep him stationary for the food related assaults to take effect, stationary, to censor and control in-comming, out-going communications with the Courts and the people (family) that movent desire contact with, to keep Preston Catchings, lock down, in one place of control, to monitor food assaults and intake, to protect the methodical strategem ("medically redound") forcing plaintiff into a comatose state of mind, by acid assaults to the Liver's membranous tubular nervous system, (the vertebrate inside of the Liver) Thereafter, inadequate food supplies (Nutritional Starvation), the consequences, brain cell death and/or organ destitute comatose state of mind, due to the acid blawed vertebrate inability to direct the synthesizing and store the specialized proteins, and biochemical hormones, and secrete to the brain an organs when requisitioned, necessary to effect physiological activity.

Further Sanction are Based in accord with Federal Rules Civil Procedure, The (6th) Sixth Amendment of Our Constitution, and 42 P.S.A. 2. 4019 Sanctions, implied for failure to comply with Court Orders, At motion to compel and the hearing thereof, further sanctions are indicated from the inferred

Failure to participate in the framing of a discovery plan, required by Federal Rules Civil Procedure 9.26(g) and/or failure to disclose; "false or misleading disclosure;" Refusal to Admit, R. 26(c), in conjunction with Evasive or Incomplete Disclosure or Responses, R. 37 A2. (B3) and failure to cooperate in discovery. Sanction Fed. Rules Civil Procedure Rule 37 B., Sanction by the Court. 37 B.2(B) An Order refusing to allow the disobedient party to support or ~~oppose~~ designated claims or defenses, or prohibiting that party from introducing designated rebuttals.

R. 37 B 2 (c) An Order striking out Summary Judgment, medical reports in evidence, and misrepresented declarations, psychiatric and medical documents, presented to this Court., An Order staying further proceeding until the order is obeyed., Dismissing the action or proceeding or any part thereof, or rendering a judgment by default against the disobedient party

R. 37 B 2(d) (in relevant part) in addition to the above sanction, an order treating as a contempt of Court the failure to obey any and all orders, including those stated above. (anticipating modicum evid.)

R. 37 B 2 (e) Where a party has failed to comply with an order under 35 (a), requiring that party to, yield and grant the medical testing procedures, (stated above) requested in petition for inspection and copying of documents and in motion to compel and all other addresses to the defendants and the Court. "In addition to the above" the Court shall require the party failing to obey Court Orders, Fed. R. Civ. Pro, 26, 35, 34 and Rule 37, with the attorney advising that party, to pay the expenses rationalized above including attorney fees and damages sustained during purposeful delays to protect or consummate plaintiff's death."

In justified augmentation to the sanction prayed for above Aggrieved beseechers this Court's approval of (20,000) twenty thousand dollars to acquire assistance of a lawyer, to protect

detentioning, payable directly to Preston Catchings #BJ8956, that he might personally choose a lawyer and be able to dictate the contract. Allocate some of the monetary and compensatory damage payments, spelled out in the initial Complaint, including any additional sanctions this Court deems necessary to compel compliance with the exact precision of the request for production of documents petition, and the Federal Rules Civil Procedure Rules 26, 34, 35 and 37.

All punitive, monetary and compensatory sanctions prayed for, are related to injuries sustained during the course of this litigation, case no. 03-284 Eric. That's before this Court at present. For the above implored sanctions Aggrieved will pray.

enclosed: Cert Serv.

7/8/2005

Respectfully submitted
~~BJ8956~~ BJ8956
 Preston Catchings inst. no. BJ8956,
 I, A-8, State Correctional Facility
 at Cresson P.O. Box "A", Old
 Route 22 Cresson P.A.
 zip 16699-0001

In The United States District Court
For The Western District of Pennsylvania 7/8/2005

Preston Catchinas

vs

Mr Morrow et al.

Civil Action NO: 03-284 Erie
before: The Hon. Judge McLaughlin

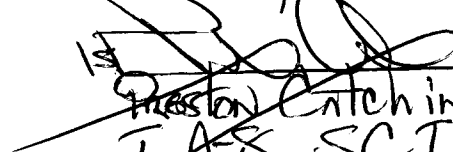
Certificate of Service

I Preston Catchinas #BJ8956, hereby certify that a true and correct copy of the foregoing "Motion for Sanction" is being served upon the following persons, by first class mail, at the same time it being mailed to the Courts, this 8th day, 7 month of the year 2005. (7/8/2005.)

Office of the Attorney General
Mr. Scott A. Bradley Esq. (Sen. Deputy Att. Gen.)
6th floor Manor Complex, 564 Forbes Ave.
Pittsburgh Pennsylvania zip 15219.

enclosure: Motion for Sanction.

Respectfully Submitted

 #BJ8956
Preston Catchinas #BJ8956
I.A.S. SCI CRESSON
P.O. BOX "A" Old Route 22
Cresson PA. 2016699.